REMARKS

Claims 1-18 are pending.

Applicants gratefully acknowledge withdrawal of the rejections of Claims 1-17 under 35 U.S.C. § 112, 1st and 2nd paragraphs that were asserted in the Office Action mailed November 9, 2006.

Claim Rejections under 35 U.S.C. § 103(a

In the Office Action, the Examiner rejects Claims 1-18 under 35 U.S.C. 103(a) as being unpatentable over Roy Rada ("Rada"), "Hypertext writing and document reuse: the role of a semantic net" in view of U.S. Patent No. 6,947,959 to Gill ("Gill"). This rejection is respectfully traversed.

Rada discloses a semantic net that can be used to classify and/or relate paragraphs of text, for example to help an author create a book or paper using the text paragraphs. The semantic net can be represented as a visual graph (see e.g., section 2.4, e.g. page 129, line 9 and Figure 5; and also section 2.1, e.g. page 126, lines 5-6). In particular, Rada's semantic net includes link objects, where each link object includes a source node, a link type, a target node, pointer(s) to paragraph(s), and perhaps other attributes (see section 2.3 on page 128 of Rada). Thus, each link object includes a "node-link-node" triple that indexes a paragraph (e.g. the paragraph that the link object's pointer points to). Rada's Figures 2 and 4 show examples of "node-link-node" triples and corresponding paragraphs. Rada's Figure 5 shows an example of an outline represented in a semantic net form.

In section 3.2 spanning pages 131, 132 Rada teaches that in order for a person to visually inspect a particular semantic net, that semantic net should not have too many different link types. Rada also teaches that a source node name should occur in the semantic net more than once, but not too many times, and suggests that 4 to 13 occurrences is most manageable for people (see e.g. page 132, lines 2-4). Section 3.2 of Rada describes characteristics of a particular semantic net directed to the theme of "Hypertext", that the author was using an example. Figures 9 and 10 show numbers

relating to this particular semantic net. (Note that Rada does not disclose this particular semantic net in whole, but instead refers to selected properties or characteristics of it). For example, Figure 9 indicates that the term "Microtext Exercises" occurred 12 times as a source node name in the "Hypertext" semantic net.

Rada goes on to describe in Section 4 (e.g. on page 133) that a linear document can be automatically generated from a semantic net by automatically traversing the semantic net, for example to print the contents of the semantic net in a linear form. Section 4.1 discusses different techniques for automatically traversing the semantic net. Section 4.2 discusses showing the structure of "deeper models" or a more complex semantic net, in a linear outline (e.g. Figure 13). Section 4.3 discusses the place of titles and captions in the automatically generated linear document, and suggests that captions (e.g. a target node name) can be placed in the margin next to a corresponding paragraph. For example, if a node-link-node triple points to a paragraph, then when the paragraph is printed, the name of the target node of the triple is printed next to it in the margin. See, e.g., Rada at page 136, text near the center of the page. Section 4.4 discusses the issue of "local cohesion", for example how to provide or ensure logically and aesthetically smooth transitions from one component of text to a next component of text. Rada's Section 5, the author summarizes general remarks regarding semantic nets.

However, Rada does not disclose or suggest the features that the Examiner says it does.

The Examiner asserts on page three of the Office Action that Rada discloses in Section 3.2 logging different search requests received from different users, as encompassed by Claim 1. This is incorrect. Section 3.2 of Rada merely a particular semantic net that has particular link names, source node names, and target node names, each name occurring a specific and often different number of times in that semantic net, as shown in Figures 8-10. There is no mention of search requests, or of logging search requests.

The Examiner asserts on page three of the Office Action that Rada discloses in Section 4, "*expanding the logged search requests*" as recited in Claim 1. This is incorrect. Section 4 does

not disclose or mention search requests, and does not disclose or suggest expanding search requests, much less logged search requests. Instead, Section 4 discloses methods for automatically printing the entire contents of a semantic net in a linear form, by automatically traversing the semantic net and printing the contents as they are encountered during the traverse.

The Examiner asserts on page three of the Office Action that Sections 2.4, 3.2 of Rada disclose "*applying a statistical clustering algorithm to the expanded logged search requests based on content of the expanded logged search requests, thereby grouping similar search requests together*", as recited in Claim 1. This is incorrect, because Section 2.4 merely describes an exemplary structure of an exemplary semantic net (see, e.g., Figure 5), and Section 3.2 merely shows the contents of a different exemplary semantic net, e.g. specific labels and the number of times they occur in that particular semantic net (e.g., 227 occurrences of the link name "include" as shown in Figure 8). There is no disclosure of search requests, of applying a statistical clustering algorithm to search requests of any kind, or of grouping similar search requests.

The Examiner asserts on page three of the Office Action that Section 2.1 of Rada discloses "*identifying, using a semantic net hierarchy, a lowest-level term in the hierarchy that subsumes all queries in a grouping of search requests*", as recited in independent Claim 1. This is incorrect, because Section 2.1 merely discloses an element of a semantic net structure, in particular a "node-link-node" triple, with a text paragraph associated with (e.g., pointed to by) the link of the triple. See for example, Figure 2. In particular, Section 2.1 indicates that a semantic net is a graph where natural language terms have been used to label nodes and links (e.g., page 126, lines 6-7), and further indicates that some semantic links can manifest inheritance. But, Section 2.1 fails to disclose or suggest "*identifying, using a semantic net hierarchy, a lowest-level term in the hierarchy*". Section 2.1 likewise fails to disclose or suggest "*identifying,... a lowest-level term... that subsumes all queries in a grouping of search requests*", because Section 2.1 does not disclose or suggest grouping search requests, does not disclose or suggest analyzing queries in such a grouping, and fails to disclose or suggest identifying a lowest level term that subsumes the queries.

Gill fails to overcome the deficiencies of Rada with respect to Claim 1 that are set forth above.

Independent Claims 4, 7 and 10 have different features from independent Claim 1, but the Examiner glosses over them with the incorrect blanket statement that "Claims 4-12 have the same subject matter as of Claims 1-3 and [sic] essentially rejected for the same reasons as discussed above."

In contrast to Claim 1, Claim 4 recites "*logging the search **results**"* rather than search requests, and further recites "*expanding the metadata*" "*associated with the digital media records*" defined by the search results.

In contrast to Claim 1, Claim 7 recites "*logging the search requests for which the search result was **empty***".

In contrast to Claim 1, Claim 10 recites "*logging the search requests for which a user has expressed interest in a selected media record*".

Rada fails to disclose or suggest these features of independent Claims 4, 7 and 10, and Gill fails to overcome these deficiencies of Rada.

For at least this reason and the fact that independent Claims 4, 7 and 10 share with Claim 1 various features not disclosed or suggested by Rada or Gill (as described above with respect to Claim 1), the asserted combination of Rada and Gill fails to disclose or suggest independent Claims 4, 7 and 10.

Withdrawal of the rejection of Claims 1-18 under 35 U.S.C. 103(a) over Rada in view of Gill is respectfully requested.

CONCLUSION

In view of the above amendment, applicant believes the pending application is in condition for allowance. Favorable consideration on the merits and prompt allowance are respectfully requested. In the event any questions arise regarding this communication or the application in general, the Examiner is invited to contact Applicants' undersigned representative at 1.206.262.8900.

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Respectfully submitted,

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